

# PLAINTIFFS' EXHIBIT 2

Tod Heesch

July 27, 2018

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

1. PATRICK PETE STOVER,	)	
2. SHERI LYNN STOVER,	)	
Plaintiffs,	)	
	)	
VS.	)	CIVIL ACTION NO.
	)	17-CV-1002-HE
	)	
1. STATE FARM FIRE AND	)	
CASUALTY COMPANY, a foreign	)	
for profit insurance	)	
corporation,	)	
Defendant.	)	

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ORAL AND VIDEOTAPED DEPOSITION OF

TOD HEESCH

JULY 27, 2018

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ORAL AND VIDEOTAPED DEPOSITION OF TOD HEESCH,  
produced as a witness at the instance of the Plaintiffs,  
and duly sworn, was taken in the above-styled and  
numbered cause on the 27th day of July, 2018, from  
9:59 a.m. to 4:56 p.m., before Trisha Myler, CSR in and  
for the State of Texas, reported by machine shorthand,  
at Hampton Inn & Suites, 1001 Commerce Street,  
Boardroom A, Fort Worth, Texas 76102, pursuant to the  
Federal Rules of Civil Procedure and the provisions  
stated on the record or attached hereto.

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A P P E A R A N C E S

FOR THE PLAINTIFFS, PATRICK PETE STOVER AND SHERI LYNN STOVER:

Mr. Michael McGrew  
Mr. Matthew McGrew  
MICHAEL MCGREW AND ASSOCIATES  
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Oklahoma City, Oklahoma 73102  
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FOR THE DEFENDANT, STATE FARM FIRE AND CASUALTY COMPANY:

Mr. Lance Leffel  
GABLEGOTWALS  
One Leadership Square, 15th Floor  
211 North Robinson  
Oklahoma City, Oklahoma 73102  
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ALSO PRESENT:

Ms. Christina Bocanegra

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1 decide that it's not tarpable, that's -- that's their  
2 decision.

3 Q. (BY MR. MICHAEL MCGREW) Well, I was asking you  
4 that, because you did see the home and you saw --

5 A. I don't have an opinion on whether it was able  
6 to be tarped or not.

7 Q. Okay. So you're not going to come to court and  
8 say yea or nay then; you just don't have an opinion?

9 A. I don't have an opinion on that.

10 Q. Okay. A month after the -- your inspection,  
11 you don't know what the condition of the Stovers' home  
12 was, do you?

13 A. Well, I'll just cut to the chase. I don't know  
14 what the Stover's home has looked like since I've been  
15 out there. I've not returned to the property, so I  
16 can't give you any opinion on what it looks like since  
17 I've been there.

18 Q. The damage was going to continue as long as  
19 rain and wetness continued to be present and intrude  
20 into the Stover home, correct?

21 MR. LEFFEL: Objection. Form.

22 Go ahead.

23 A. If the home had openings in the roof that were  
24 not covered by tarps or any other methods, then it  
25 was -- it's entirely possible that rain would be able to